

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

PIONEER SERVICES, INC.,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.: 2:06-cv-377-WKW
)	
AUTO-OWNERS INSURANCE COMPANY, INC., et al.,)	
)	
Defendants.)	

MOTION FOR EXTENSION OF DISCOVERY CUT-OFF DATES

COMES NOW Defendant, Auto-Owners Insurance Company, by and through the undersigned counsel, and moves this Honorable Court to extend the discovery deposition cut-off date in the above-referenced action to April 30, 2007, and for grounds shows unto the Court as follows, to wit:

1. The parties have taken a number of depositions in the above-referenced action; however, counsel anticipate that depositions of experts may need to be taken by the parties beyond the currently scheduled March 20, 2007, discovery cut-off date.

2. The undersigned counsel for Defendant with the approval of counsel for Plaintiff, therefore, requests that the deadline for discovery depositions be extended until April 30, 2007.


3. The undersigned counsel for Defendant has spoken with counsel for Plaintiff regarding this motion and understands that counsel for Plaintiff has no objection to the granting of this motion.

4. The undersigned does not anticipate the granting of this motion will delay the trial of this action

WHEREFORE Defendant, Auto-Owners Insurance Company, by and through the undersigned counsel, moves this Honorable Court to extend the discovery deposition cut-off date in the above-referenced action to April 30, 2007

Dated this the 5th day of March, 2007.

Respectfully submitted,



JOEL H. PEARSON (PEA019)
ONE OF THE ATTORNEYS FOR DEFENDANT
AUTO-OWNERS INSURANCE COMPANY

OF COUNSEL:

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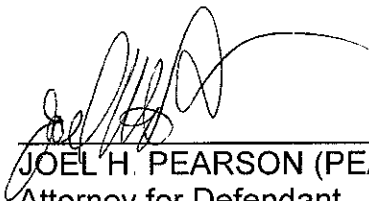
CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2007, I electronically filed the foregoing with the Court using the CM/ECF system, and I hereby certify that I am serving the foregoing document to the following:

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Joel H. Pearson', is written over a horizontal line.

JOEL H. PEARSON (PEA019)

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